

# **EXHIBIT A**

**Bonner, Kelly**

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**Sent:** Monday, February 1, 2021 6:12 PM  
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**Subject:** RE: In re Valsartan, Losartan, and Irbesartan Products Liability Litigation, No. 1:19-md-02875

Counsel,

Plaintiffs will be using the following documents as exhibits to their opposition to ZHP's motion for a protective order, which will be filed momentarily.

ZHP00291945  
ZHP01843066  
ZHP00016117  
ZHP00332356  
ZHP00332903  
ZHP01377828  
ZHP00249181  
ZHP01870977  
ZHP00021455  
ZHP01523947  
ZHP00088944  
ZHP02211431  
ZHP00670999  
ZHP00865174  
ZHP00865188  
ZHP00246515  
ZHP00271397  
ZHP01907462  
ZHP02503597  
ZHP01990527  
ZHP00343409  
ZHP00324681  
ZHP01120762  
ZHP00320410  
ZHP00325056  
ZHP02385354  
ZHP01937518  
ZHP00306319

ZHP00341377  
ZHP00309217  
ZHP00303912  
ZHP00320441  
ZHP00352121  
ZHP00358575  
ZHP00325765  
ZHP00337032  
ZHP00351971  
ZHP00352112  
ZHP00330623  
ZHP02500007  
ZHP02493784  
ZHP00827480  
ZHP00301610

We understand that you will not be able to assess whether these documents should remain confidential before Plaintiffs' opposition is filed. As a result, we will provide the documents to the Court for its in camera review.

Plaintiffs describe the above document in great detail in their brief, and those descriptions are hereby incorporated into this email.

In light of those descriptions, there is nothing about the documents that justifies treatment as confidential under the protective order, especially given the public health interests involved.

Nevertheless, Plaintiffs are available to meet and confer regarding the confidentiality designations of these documents, as required before ZHP's motion to seal pursuant to the protective order.

Plaintiffs will also be relying on the following documents that have already been attached to prior filings with the Court:

ZHP01893902  
ZHP00310874  
ZHP02125655  
TEVA-MDL2875-00082208  
ZHP01976459  
HUAHAI-US00008050

Due to the ongoing meet and confer, these documents will also be provided to the Court for its in camera review.

Best,  
Chris

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